UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

Joseph Christie, individually and on behalf of all others similarly situated,

Plaintiff,

Case No.: 4:20-cv-00518

v.

Contract Callers Inc. and John Does 1-25,

Defendants.

PLAINTIFF'S <u>UNOPPOSED</u> MOTION TO CONDUCT THE SCHEDULING CONFERENCE VIA VIDEO CONFERENCE (ZOOM)

Now comes Plaintiff, by and through the undersigned counsel and files this Unopposed Motion to conduct the scheduling conference via Zoom and states:

- 1. Pursuant to the Court's Order dated September 10, 2020 (ECF 16), the parties are to conduct a personal face-to-face meeting for the purposes of conducting a Scheduling conference.
- 2. Due to concerns of Covid-19, Plaintiff and Defendant's counsel respectfully ask that they conduct the Scheduling Conference via Zoom, thereby having a face to face meeting but avoiding the risks of travel and exposure to the virus.

3. Attached is a proposed Order granting the instant Motion.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court issue an Order granting the parties the right to conduct the Scheduling Conference via Zoom.

Certification of Conference

I hereby certify, under penalties of perjury, that prior to filing, I conferred with counsel for Defendants who has indicated that it does not oppose the relief being sought in the within Motion.

/s/ Raphael Deutsch
Raphael Deutsch, Esq.

Dated: September 16, 2020

Respectfully Submitted,

/s/Raphael Deutsch Stein Saks, PLLC By: Raphael Deutsch 285 Passaic Street Hackensack, NJ 07601 Phone: (201) 282-6500 Fax: (201) 282-6501

Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2020, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Raphael Deutsch
Raphael Deutsch, Esq.